



BP Oil Company



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May 11, 1988

Mr. Lawrence Falkin
U.S. Environmental Protection Agency, Region III
CERCLA REMOVAL ENFORCEMENT SECTION (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

Re: Metro Container Corporation Site,
BP Oil Company's RESPONSE to USEPA's
CERCLA/RCRA REQUEST FOR INFORMATION

Dear Mr. Falkin:

This letter will serve as BP Oil Company's ("BP Oil") Response to the REQUEST FOR INFORMATION filed pursuant to Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 USC Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA"), 42 USC Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA").

BP Oil objects to each and every paragraph of this Request as it applies to "empty unwashed 55 gallon drums" as outlined in your letter of April 12, 1988. The basis for this objection is that the Request exceeds the authority of U.S. EPA to request information pursuant to RCRA and CERCLA. Nevertheless, without waiving its objections and in the spirit of cooperation, BP Oil will provide responses to the request for information about the Metro Container Corporation Site issued by U.S. EPA on April 12, 1988.

RESPONSES

1. BP Oil does not admit that it sent to, transported to or disposed of hazardous substances or hazardous wastes at the site. BP Oil acknowledges that it sent empty drums to the site containing the following residues:

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- a) Oil; and
- b) Lubricating oil additives (referred to as "Chemical" in the enclosed documentation).

Exhibit 1 contains a listing of oils and lubricating oil-additives currently included in the Compounding and Packaging (C&P) Plant Inventory. The empty drums sent to Metro Container may have contained some of these materials when full, although not all of these materials may have been involved. Additionally, this listing is not all inclusive. There may have been other compounds contained in these drums before they were emptied that are not listed.

BP Oil also acknowledges that it sent empty scrap and reject drums to the site. Because the drums were empty, containing only residues, BP Oil is not able, at this time, to make an accurate estimate of the amount of residual oil and chemicals shipped to the site in empty drums.

- 2. BP Oil shipped approximately 18,700 "empty unwashed 55 gallon drums" to the site from August, 1984 to January, 1988. For the residual content and quantities, see Response #1.
- 3. BP Oil does not have records in its possession documenting the shipment of empty drums to the site prior to 1984. Since 1984, BP Oil sent "empty unwashed 55 gallon drums" to the site on almost a monthly basis. Full documentation is supplied in Response #5.
- 4. BP Oil does not have any documents in its possession relating to correspondence between BP Oil and regulatory agencies regarding such substances and/or containers in connection with activities at the site.
- 5. BP Oil encloses the following correspondence between BP Oil and Metro Container attached in Exhibit 1 in the following parts:
 - a) Exhibit 2(a) - Checks;
 - b) Exhibit 2(b) - Bills of Lading;
 - c) Exhibit 2(c) - Monthly Reports Issued by Metro; and
 - d) Exhibit 2(d) - Miscellaneous Correspondence
- 6. BP Oil does not have in its possession any documents relating to any other persons who generated, treated, stored, transported or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances and/or containers at the site.

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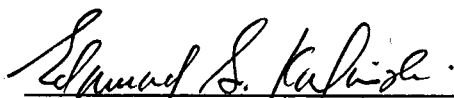
7. BP Oil does not have any deeds, rights-of-way, leases or other real interests in the site.
8. BP Oil sold empty unwashed 55 gallon drums to Metro. Scrap and reject drums were either sold to or exchanged with Metro.

Copies of documents maintained by BP Oil Company of transactions with Metro Container Corporation are enclosed with this letter. (See Response #5) These documents were authored by Metro Container, and BP's copies are currently held by John P. Sebold, Manager of BP Oil's Marcus Hook Compounding and Packaging (C&P) Plant. They were found through a review of C&P files and records.

BP Oil is in the process of reviewing past insurance coverages for releases of hazardous wastes and hazardous substances. If it is determined that such coverage exists, BP Oil will provide copies of all relevant policies.

Thank you.

Sincerely,


Edmund S. Kufinski
Refinery Manager


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